

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

/

DECLARATION OF CARLOS A. GARCIA PEREZ

I, Carlos A. Garcia Perez, declare:

1. I have personal knowledge of the following facts and, if called to testify, I could and would competently testify thereto based on my personal knowledge.
2. I am a partner at Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP, counsel of record for Plaintiff, Jane Doe, in the above-captioned matter.
3. I submit this Declaration in support of Plaintiff's Motion for Sanctions pursuant to Fed. R. Civ. P. 11, filed concurrently herewith.
4. Attached hereto as Exhibit A is a true and correct copy of the transcript of the October 23, 2025, deposition of [REDACTED], who is referred to as "Rose" in Plaintiff's Rule 11 Motion (hereinafter, "Rose"), to be filed under seal.
5. Attached hereto as Exhibit B is a true and correct copy of a document produced by Rose under Bates Stamp "AH005," to be filed under seal.

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I declare under penalty of perjury under the laws of the United States of America and the State of Florida that I read the foregoing declaration and that the facts stated therein are true and correct.

Dated: December 4, 2025

s/Carlos A. Garcia Perez
CARLOS A. GARCIA PEREZ